

**REMARKS**

In the September 20, 2005, Office Action, the Examiner noted that claims 12, 13, 15, 17 and 19 were pending in the application and were rejected under 35 USC § 102(e) as anticipated by U.S. Patent 5,907,837 to Ferrel et al. (Reference J). Claims 12, 13, 15, 17 and 19 remain in the case. The Examiner's rejections are traversed below.

In rejecting the claims, it was asserted that "Column 30 Table 1, Table 2 Lines 35-60" (Office Action, page 3, line 18) of Ferrel et al. disclosed that "the identifiers of the objects within each environment are obligatory unique, but are allowed to be non-unique relative to other objects within different environments" (claim 12, lines 5-7). However, column 24 of Ferrel et al. indicates that that this is not the case. "[T]he title, the sections, the subsections (if present), the search objects and the roots of the stories are the OLE storages" (column 24, lines 20-22) and "[e]ach of these storages has a GUID assigned to it" (column 24, lines 22-23). For example, "[a]ssociated with the title root 622 is a GUIDa that uniquely identifies the title ... [and] Section 1 is represented by a node 624 and has a GUIDb associated with it that uniquely identifies the section" (column 24, lines 32-37).

It appears that the Examiner may have been confused by different uses of the term "context" in Ferrel et al. and the claims. Claim 12 recites "modeling the environment of each object by a context of the identifiers of the objects within the environment" (claim 12, lines 4-5). Modeling the environment in this manner permits "identifiers of the objects within each environment ... to be non-unique relative to other objects within different environments" (claim 12, lines 5-7) as noted above. Thus, in claim 12, the "context of the identifiers of the objects" (claim 12, line 4, emphasis added) refers to "the objects within the environment" (claim 12, lines 4-5).

On the other hand, in Ferrel et al. "context" is used not with respect to identifiers, but with respect to the content of data. A problem addressed by Ferrel et al. is that on-line search "results are often brought out of context, [so] the user does not have any idea about the adjacent material" (column 2, lines 32-33). To overcome this problem,

the IR client 435 gets the GUID of the current section, a sort specification and a results specification from the viewer 202. ... The results specification determines the properties of interest, such as, for example, the content object GUID, context information, and subject of the content object

(column 26, line 61 to column 27, line 1). Thus, the heading "Context ID" in Tables 1 and 2 which were cited as disclosing "non-unique [identifiers] relative to other objects within different environments" (claim 12, lines 6-7) refers to the identifier (ID) of the context information which places the content of the data in context. It does not define the context of the identifiers of the

objects. This is made clear by the inclusion of "(DWORD)" below "Context ID" in Table I, where "DWord" is defined in the description of the "Context Information table, which is ... used to map a given context (ICP ID, source ID, Section ID) to a unique DWord (four bytes)" (column 31, lines 61-65). An example of a Context Information table is provided in Table 4 at the top of column 32.

As noted above, column 24, lines 22-23 of Ferrel et al. defines the acronym "GUID" as the identifier of "search objects and the roots of the stories" in storages. The appearance of the same GUID value on several lines and columns of the tables in columns 30 and 32 of Ferrel et al. does not mean that objects have to be defined contextually; that is contrary to the statement that the GUIDs are unique, as indicated in the quotation from column 24, lines 32-37 of Ferrel et al. provided above. For example, the appearance of "1501" in both the "Root Container GUID" and the "Container GUID" columns of Table 2 apparently means that the "Title-Section" is in the root container of the story (as stated at column 30, lines 62-63), while the appearance of "1501" in both the first and second rows of the "Root Container GUID" column of Table 2 apparently means that the "Section-Search" (see the "Relation" column) has the same "Root Container GUID" as the "Title-Section" above it.

In the Response to Arguments on pages 5-6 of the Office Action, it was asserted that column 7, lines 25-30 of Ferrel et al. "indicates that the content objects are shared across multiple titles" (Office Action, page 5, line 16). Even if this were true, it would be irrelevant. The distinction over Ferrel et al. is not related to the content of objects, but rather the uniqueness of the identifiers. If column 7 of Ferrel et al. referred to the same identifier being used for objects in different titles, then it might be relevant.

In addition, the Response to Arguments referred to "a title tree having subsections containing the content objects, said title tree providing the environment for said content object" (Office Action, page 5, line 18 to page 6, line 1) as being disclosed at column 24, lines 30-35 of Ferrel et al. As indicated by the above quotation from column 24, lines 32-37, this portion of Ferrel et al. supports the Applicants position that Ferrel et al. teaches unique identifiers, contrary to the unsupported assertion on page 6, lines 1-2 of the Office Action that "Ferrel disclosed that content objects may be non-unique relative to other objects within different environments." The comments in the remainder of the paragraph spanning pages 5 and 6 of the Office Action were addressed above in the discussion of the tables in columns 30 and 32 of Ferrel et al.

As explained above, when the cited portions of Ferrel et al. are read in context of the entire disclosure of Ferrel et al., there is no suggestion that "the identifiers of the objects within each environment are obligatory unique, but are allowed to be non-unique relative to other

objects within different environments" (claim 12, lines 5-7). Therefore, it is submitted that claim 12 and claims 13, 15, 17 and 19 which depend therefrom, patentably distinguish over Ferrel et al. for the reasons discussed above.

### Summary

It is submitted that Ferrel et al. does not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 12, 13, 15, 17 and 19 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: 12/20/05

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450  
on 12/20/2005  
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Date: 12/20/05